

Remarks/Arguments

In the first Office Action herein, dated April 18, 2007, the Examiner rejected all claims in the application under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,943,477 to Rao et al.

Applicant has carefully reviewed this Action, along with the single cited and applied prior art reference, and the claims and supporting disclosure content of the present patent application, and by the present Amendment, proposes certain current amendments in several of the claims which are believed now to place all claims in this application in conditions for allowance.

As is set forth on page one in the specification of this application, the methodology of the present invention is capable of dealing with two different recognizable aspects of dot gain, one of which is referred to as physical dot gain, and the other of which is referred to as optical dot gain. Contributing to this special ability of the methodology of the invention is the approach which has been chosen for use in conjunction with creating a pixel intensity correction and calibration curve designed to equip a color-image output device to render color image data in a fashion which greatly minimizes both categories, just mentioned, of dot gain.

The invention, in this context, focuses attention deliberately on the use of geometric pixel patterns which are pre-selected and pre-determined, with each pattern including a central pixel, and a pre-determined geometric arrangement of neighboring pixels relative to various sides of the central pixel deployed in several specific geometric patterns. In order to develop calibration “numbers” for each color involved in the calibration process, a print is made

of a large region defined by next-adjacent printed images of each one of these selected geometric patterns, one pattern at a time, with readings then made regarding this printed “calibration” material to determine the correction-relevant parameter which is referred to in the present application as percentage of printing coverage.

The single cited and applied reference does none of these things, and very specifically deals only with one of the two types, above-mentioned, of recognizable dot gain. Very specifically, and as the reference patent clearly points out, its proposed method of calibration (a) does not depend upon geometric considerations, (b) in no way deals with any preselected group of *geometric patterns of pixels*, and (c) features instead, as its expressly stated central contribution to the art, the practice of examining printed calibration material by looking specifically to determine *the amount of ink that is deposited at a particular central location in a grouping of pixels*. This approach, at best, deals only with that aspect of dot gain which applicant has referred to as physical dot gain. Nothing specifically proposed by the reference has anything to do consciously with addressing optical dot gain.

In applicant’s claimed invention, a color printing calibration intensity correction curve is based entirely upon calibration numbers which are derived from a practice of examining printing coverage considerations in relation to the mentioned predetermined set of geometric pixel patterns. Geometric pattern thinking, as has been stressed above, is not only foreign to the practice described by the cited and applied prior art reference, it is studiously avoided and ignored: “The present invention ... relates to the calibration of digital printers ... [with a method

and apparatus which] ... do not depend on geometric assumptions on (sic) ... [regarding] ... the printed dots.”

By the present Amendment, the claims have been effectively currently changed by current amendments made in claims 1 and 6 which point out, with much greater specificity, the central dependence of practice of the present invention on information that can be derived from calibration use of predetermined geometric pixel patterns.

Accordingly, it should be clear to the Examiner, on his taking a closer look at applicant's specification, claims and drawings, along with directing a closer look at the methodology actually described and illustrated in the cited and applied reference, that applicant's claims, as now presented in this application on the basis of entry of this Amendment, call for a calibration methodology which is dramatically different from the methodology described in the reference. Accordingly, all claims now presented in the application are deemed to be clearly distinguishable and therefore patentable over anything shown or suggested by the cited reference, and because of this, favorable reconsideration of this application, and allowance of all now-presented claims, are hereby respectfully solicited. If the Examiner has any questions regarding the amendment or remarks, the Examiner is invited to contact Attorney-of-Record Jon M. Dickinson, Esq., at 503-504-2271.

Provisional Request for Extension of time in Which to Respond

Should this response be deemed to be untimely, Applicants hereby request an extension of time under 37 C.F.R. § 1.136. The Commissioner is hereby authorized to charge any

additional fees which may be required, or credit any over-payment to Account No. 22-0258.

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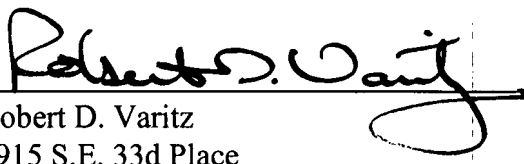
Respectfully Submitted,

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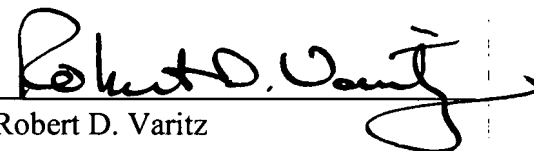
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I hereby certify that the attached Response to Office Action under 37 C.F.R. § 1.111 is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 C.F.R. 1.10 on the date indicated above and is addressed to:

Mail Stop Amendment
Commissioner for Patents
P.O. Box 1450
Washington, D.C. 22313-1450


Robert D. Varitz